cuted a chattel mortgage on certain personal property temporarily in Iowa, and certain other personal property in North Dakota, to the Red River National Bank, who is the intervener in this case. The mortgage was recorded in North Dakota, where the mortgagee resided. On August 4th, 1898, plaintiff attached the property located in Iowa. The evidence shows that plaintiff had actual notice of the chattel mortgage. The trial court awarded the property to the intervener. *Held,* notwithstanding that by the laws of North Dakota a mortgage is void as against creditors of the mortgagor, unless said mortgage is recorded in the place where the property is situated, the present case must be determined by the laws of the place where the property is situated, and by the laws of Iowa such mortgage is good when the creditor has actual notice of the same.

The court argues that the rule that the lox loci contractus governs when personality is concerned, is correct as far as the parties to the mortgage are concerned; but as between the parties the mortgage good in North Dakota, and the statutory invalidity as to third parties when the goods are in a state where no such rule exists, is of no effect, since the law of the latter governs. *Green v. Van Buskirk,* 7 Wal. 139. The laws of one state are recognized in another only by comity and are not compulsory.

This rule, however, would seem to be open to some doubt. *Watson v. Campbell,* 38 N. Y. 153.

CONSTITUTIONAL LAW—NEWSPAPERS—PUBLIC PRINTING—COMPENSATION—VAN HARLINGEN V. DOYLE, COUNTY AUDITOR, 66 Pac. 44 (Cal.).—The plaintiff, a publisher of a newspaper of less than one year's existence, under a contract with the county auditor, printed certain tax lists. *Held,* that plaintiff might recover compensation, in spite of a County Government Act, providing that no printing should be procured of any person whose paper had not been established in the country for one year or more, such act being in violation of the provision of the State Constitution, Art. 1, Sec. 2, that "all laws of a general nature shall have a uniform operation."

The above act plainly intended to exclude all newspapers not established in the county from any share in public or official advertising. Laws have generally been held to have a uniform operation when they apply to all of a class, but how arbitrary such classes may be made is always a question of doubt and uncertainty. *Smith v. Judge of Twelfth District,* 17 Cal. 556; *Abeel v. Clark,* 24 Pac. 383; *Pasadena v. Stinson,* 27 Pac. 604; Cooley's Const. Lim. pp. 389-397. In *State v. Mayor of Hoboken,* 38 N. J. L. 110, a contrary view seems to be taken, the mayor being compelled, under the city charter, to designate as official organs those newspapers which had been established a year or more.

CORPORATION—DISSOLUTION—EXTINGUISHMENT OF LIABILITIES—ACTION FOR LIBEL—ABATEMENT AND REVIVAL—SHAYNE V. EVENING POST PUB. CO., 61 N. E. 115 (N. Y.).—The defendant was dissolved by the expiration of the time limited in its certificate of incorporation. An action for libel against it was thereby abated and an order was sought reviving it against the former directors of the defunct corporation. *Held,* that the action may be continued and revived against the former directors as trustees of the corporation for the benefit of the stockholders. *See Comment.*